

PUTNEY, TWOMBLY, HALL & HIRSON LLP

DANIEL F. MURPHY, JR.
THOMAS A. MARTIN
WILLIAM M. POLLAK
JAMES E. McGRATH, III
CHRISTOPHER M. HOULIHAN
MARY ELLEN DONNELLY
GEOFFREY H. WARD
E. PARKER NEAVE
MARK A. HERNANDEZ
PHILIP H. KALBAN
JEROME P. COLEMAN
BARBARA M. MAISTO
CARYN B. KEPPLER
MICHAEL D. YIM
MARIANNE CALABRESE

ESTABLISHED 1866
COUNSELORS AT LAW
521 FIFTH AVENUE
NEW YORK, NEW YORK 10175
(212) 682-0020
TELEFAX: (212) 682-9380
PUTNEYLAW.COM

328 NEWMAN SPRINGS ROAD
RED BANK, NEW JERSEY 07701
(732) 379-6020
TELEFAX: (732) 345-9444
1225 FRANKLIN AVENUE, SUITE 200
GARDEN CITY, NY 11530
(516) 746-0070
TELEFAX: (516) 746-0599
2000 GLADES ROAD
SUITE 300
BOCA RATON, FLORIDA 33431
(800) 935-8480
TELEFAX: (561) 613-4100
COUNSEL
CHARLES J. GROPPÉ
THOMAS M. LAMBERTI
HARVEY I. SCHNEIDER
ANDREA HYDE

June 14, 2019

Via ECF

Honorable Lisa Margaret Smith
United States Magistrate Judge
U.S. District Court Southern District of New York
United States Courthouse
300 Quarropas Street
White Plains, NY 10601

**Re: Estrada et al. v. Kingsbridge Marketplace Corp. et al.
S.D.N.Y. Civil Action No.: 17-cv-09890 (NSR) (LMS)**

Dear Judge Smith:

This Firm represents the Defendants in the above-referenced matter. We write this letter with consent of Plaintiffs' counsel as a joint motion to stay all proceedings pending mediation. After conducting a few depositions, the Parties have decided to attempt resolution of the dispute in mediation. If mediation is unsuccessful, the Parties will continue the proceedings.

As an exception to the stay on all proceedings, the Parties have agreed to permit limited third-party discovery in order to preserve cell phone carrier data. Specifically, Defendants have issued subpoenas to Plaintiffs' cell phone carriers seeking production of any information related to location-based services, GPS data, cell site data, and IP addresses. The Parties have agreed that all cell phone carrier data produced will remain confidential and for attorneys' eyes only.

If this joint request is granted, the Parties will promptly notify the Court of the mediation date by joint letter once it is scheduled. Thank you for Your Honor's consideration of this matter.

Respectfully submitted,

/s/ Michael Yim

Michael Yim

cc: Counsel for Plaintiffs (Via ECF Only)